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### REMARKS

Entry of this Amendment is proper because it does not raise any new issues requiring further search by the Examiner, narrows the issues on appeal, and is believed to place the present application in condition for immediate allowance.

Claims 3-6, 8, and 10-19 are all the claims presently pending in the application.

Claims 3, 8, and 10-19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Lee, et al. (U.S. Patent No. 6,658,167), and claims 4-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee.

These rejections are respectfully traversed in the following discussion.

#### **I. THE CLAIMED INVENTION**

In conventional systems, since the processing for reducing the image data is started when the client computer accesses the image server, time is required until the transmission of the reduced image data to the client computer from the image server is started. Thus, the conventional systems take a relatively long time until an image is displayed on the display device in the client computer. That is, even if the image server is accessed, the image generally cannot be quickly displayed (e.g., see specification at page 2, lines 16-23).

The claimed invention, on the other hand, the image data suitable for the output of the output device in the second client device can be immediately transmitted to the second client device. Thus, an image represented by the image data can be outputted quickly

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from the output device in the second client device (e.g., see specification at page 4, lines 19-23).

For example, in an illustrative, non-limiting aspect of the present invention as defined, for example, by independent claim 3, an image registration system including a first client device and a second client device which can communicate with a server. The first client device includes first image data transmission means for transmitting to the server image data to be registered.

The server includes image data receiving means for receiving the image data transmitted from the first image data transmission means in the first client device, **image data generation means for generating image data representing an image which can be outputted to the second client device** and representing the same image as an image represented by the image data received by the image data receiving means and including a different form of representation therefrom, and image data storage means for storing the image data generated by the image data generation means so as to be accessible from the second client device.

The second client device includes request data transmission means for transmitting to the server request data representing a request to transmit the image data stored in the image data storage means. The server further includes **request data receiving means for receiving the request data transmitted from the request data transmission means in the second client device, image data retrieval means responsive to the request data received by the request data receiving means for finding from the image data storage means the image data suitable for image output to the second client device which has transmitted the**

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request data out of the image data stored in the image data storage means in the server,  
and second image data transmission means for transmitting to the second client device the  
image data found by the image data retrieval means.

Independent claims 8 and 10 recite somewhat similar features as independent  
claim 3.

## II. THE PRIOR ART REJECTIONS

Claims 3, 8, and 10-19 stand rejected under 35 U.S.C. § 102(b) as being  
anticipated by Lee, and claims 4-6 stand rejected under 35 U.S.C. § 103(a) as being  
unpatentable over Lee.

In the "Response to Arguments" section of the present Office Action, the Examiner  
alleges that:

*"request data receiving means" and "image data retrieval means" are  
inherent in a networked image data sharing system. In networked client and  
server devices this type of communication is known as handshaking and is  
inherent to the transfer of any kind of data. In order for data to be transferred,  
a request must be sent for the client to server, or in the reverse direction, the  
client must first ask permission to upload and the server then sends the ok or  
request for data transfer.*

*U.S. Patent 6, 330, 068 to Matsyama illustrates this kind of operation  
by disclosing a client submitting a request to a server to transfer an image  
(column 28, lines 6-15).*

*U.S. Patent 6,035,323 to Narayen et al. illustrates a similar operation  
in disclosing multiple clients in communication with a server and submitting  
requests to a server to view or transfer particular images (column 11, lines 5-  
49).*

See Office Action at page 3, numbered paragraph 5; emphasis added.

(It is noted that Matsyama and Narayen are not applied by the Examiner in  
rejecting the claims, but instead, appear to be relied upon to try to establish common

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knowledge in the art. Therefore, Applicant has not discussed or responded to the use of these references. Applicant respectfully reserves the right to traverse any future rejections which apply these references.)

Applicant respectfully submits that the Examiner does not appear to be considering the actual language of the claims, but instead, merely is generalizing the features of the claim as reciting only “*handshaking*”. Applicant respectfully submits, however, that claim 3 does not merely recite “*handshaking*” as alleged by the Examiner.

Instead, claim 3 defines a novel and unobvious combination of features in which the image data suitable for the output of the output device in the (second) client device previously is generated in the image transmission server, not generated each time the receiving request data is made.

That is, in the claimed invention, the image transmission server finds the previously generated image data suitable for the output of the output device in the client device in response to receiving the request data from the second client device.

Thus, in the claimed invention, the image data can be immediately transmitted to the second client device from the server, since the image data suitable for the output of the output device in the client device previously is generated and stored (e.g., see specification at page 4, lines 19-23).

Particularly, independent claim 3 recites, *inter alia*, an image registration system including a first client device and a second client device which can communicate with a server, wherein the server comprises:

image data generation means for generating image data representing an image which can be outputted to the second

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client device and representing the same image as an image represented by the image data received by said image data receiving means and including a different form of representation therefrom; and

image data storage means for storing the image data generated by said image data generation means so as to be accessible from the second client device, ...

wherein the server further comprises:

request data receiving means for receiving the request data transmitted from the request data transmission means in the second client device;

image data retrieval means responsive to the request data received by said request data receiving means for finding from the image data storage means the image data suitable for image output to the second client device which has transmitted said request data out of the image data stored in the image data storage means in the server; and

second image data transmission means for transmitting to the second client device the image data found by said image data retrieval means (emphasis added).

As the Examiner surely knows, to anticipate a claim the reference must teach each and every element of the claim in as complete detail as recited in the claim.

Applicant respectfully submits that there are elements of the claimed invention which clearly are not disclosed or suggested by Lee.

As Applicant pointed out in the previous Amendment, the Examiner alleges that Figure 2, element 210, of Lee discloses all of the features of claim 3.

However, Applicant respectfully disagrees.

That is, Applicant respectfully reiterates that Lee does not disclose or suggest "image data generation means for generating image data representing an image which can be outputted to the second client device ...; and image data storage means for storing the image data generated by said image data generation means ... wherein the server further comprises: request data receiving means ...; image data retrieval means

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*responsive to the request data received by said request data receiving means for finding from the image data storage means the image data suitable for image output to the second client device*" (emphasis added), for several reasons.

For example, Lee discloses that the processing for modifying data is performed in the server computer each time the access is made by the client computer in Lee (e.g., see also Lee at column 3, lines 34-37).

Indeed, Lee specifically states, in element 210 of Figure 2:

TRANSMIT INFORMATION RELATED TO THE  
INTENDED USE OF DATA IN A CLIENT APPLICATION  
FROM THE CLIENT COMPUTER TO THE SERVER  
COMPUTER.

Further, Lee states, in elements 220 and 230 of Figure 2:

BASED ON THE TRANSMITTED INFORMATION,  
MODIFYING DATA TO OPTIMIZE DATA FOR ITS  
INTENDED USE OF THE CLIENT APPLICATION, and  
TRANSMIT MODIFIED DATA TO CLIENT APPLICATION  
(emphasis added).

That is, Lee discloses that the modified data for its intended use of the client application is generated by the server computer based on the information which is transmitted from the client computer.

In other words, the processing for modifying data is performed in the server computer each time the access is made by the client computer in Lee (e.g., see also Lee at column 3, lines 34-37).

In stark contrast to Lee, the claimed invention as defined by claim 3 recites that the image data suitable for the output of the output device in the (second) client device

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previously is generated in the image transmission server, not generated each time the receiving request data is made.

That is, in the claimed invention, the image transmission server finds the previously generated image data suitable for the output of the output device in the client device in response to receiving the request data from the second client device.

Thus, in the claimed invention, the image data can be immediately transmitted to the second client device from the server, since the image data suitable for the output of the output device in the client device previously is generated and stored (e.g., see specification at page 4, lines 19-23).

Accordingly, Applicant respectfully submits that, contrary to the Examiner's position, Lee clearly does not disclose or suggest all of the novel and unobvious features of the claimed invention, including, among other features, "request data receiving means for receiving the request data transmitted from the request data transmission means in the second client device" and "image data retrieval means responsive to the request data received by said request data receiving means for finding from the image data storage means the image data suitable for image output to the second client device which has transmitted said request data out of the image data stored in the image data storage means in the server", as claimed in independent claim 3 (emphasis added).

Indeed, Applicant respectfully submits that the Examiner does not appear to have responded to all of Applicant's traversal position, but instead, merely has generalized the features which are defined by claim 3 to mean "handshaking".

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For the foregoing reasons, Applicant respectfully submits that Lee clearly does not disclose or suggests all of the features independent claim 3, in as complete detail as recited in claim 3. Thus, Lee clearly does not anticipate, or for that matter render obvious, all of the features of independent claim 3.

Also, independent claims 8 and 10 disclose somewhat similar features as independent claim 3. Therefore, Applicant respectfully submits that claims 8 and 10 also are patentable over Lee for somewhat similar reasons as those set forth above.

Applicant respectfully submits that dependent claims 4-6 also are patentable over Lee at least by virtue of their dependency from claim 3, as well as for the additional features recited therein.

For the foregoing reasons, Applicant respectfully submits that Lee clearly does not disclose or suggests all of the features claims 3-6, 8, and 10, in as complete detail as recited in the claims. Thus, Lee clearly does not anticipate, or for that matter render obvious, all of the features of the claimed invention.

Accordingly, the Examiner respectfully is requested to withdraw this rejection and to permit these claims to pass to immediate allowance.

### III. CONCLUSION

In view of the foregoing, Applicant submits that claims 3-6, 8, and 10-19, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.



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Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

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**CERTIFICATE OF TRANSMISSION**

I certify that I transmitted via facsimile to (703) 872-9306 the enclosed Amendment under 37 C.F.R. § 1.116 to Examiner Wesley J. Tucker on April 21, 2005.

  
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